

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: : Chapter 11
: Case No. 01-1139 through 01-1200 (JKF)
W.R. GRACE & CO., et al., : Jointly Administered
:
:
Debtors. :

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE**

PLEASE TAKE NOTICE THAT Certain Underwriters at Lloyds, London and Certain London Market Companies that subscribed to policies in favor of W.R. Grace or its legal predecessors (“London Market Insurers”), hereby appear in the above-captioned case by its counsel, as set forth below, and enters an appearance pursuant to § 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b), and requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and §§ 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in these cases be served upon the following counsel:

James Sottile, Esquire
Joseph L. Ruby, Esquire
Michael J. Zoeller, Esquire
Baach Robinson & Lewis PLLC
One Thomas Circle, NW
Suite 200
Washington, DC 20005
Telephone No.: (202) 833-8900
Facsimile No.: (202) 466-5738
E-mail: Michael.Zoeller@baachrobinson.com

PLEASE TAKE FURTHER NOTICE THAT pursuant to § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice,

including notice of rejection of leases, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, e-mail, hand delivery, telephone, telecopy or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE THAT neither this Notice of Appearance nor any pleading, claim or suit shall waive (1) the right to have final orders in noncore matters entered only after *de novo* review by a District Court Judge; (2) the right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which London Market Insurers may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments London Market Insurers expressly reserves.

Dated: September 2, 2003

Respectfully submitted,

/s/ Francis J. Murphy

Francis J. Murphy
MURPHY SPADARO & LANDON
824 Market Street, Suite 700
Wilmington, DE 19801
Tel: 302-654-4600
Fax: 302-654-4775
E-Mail: Fmurphy@msslaw.com

James Sottile
Joseph L. Ruby
Michael J. Zoeller
BAACH ROBINSON & LEWIS PLLC
One Thomas Circle, NW, Suite 200
Washington, DC 20005
Phone: (202) 833-8900
Fax: (202) 466-5738